

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Mallinckrodt LLC
Address: 3600 N. Second Street
St. Louis, MO 63147

EPA ID Number: MO0096726484 Date: 6/21-23/16

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation ^{as incorporated in} Missouri State regs to CSR 25

Description of Violation

- | | |
|-------------------------------------|---|
| ① 40 CFR 262.11 | Make a HW determination on: ① 2 spills unknown; ② ^{potential} spill near Tank Farm |
| ② 40 CFR 265.35 | ③ Vaplock filters (include generator); ④ Unknown drum near old lab bulk area |
| ③ 40 CFR 265.16(c) | Inadequate aisle space in B105 |
| ④ 40 CFR 265.16(c) and 262.34(a)(2) | No annual contingency plan training |
| ⑤ 40 CFR 265.193(a) | Storing 2 roll offs of D006 over 90 days, only belted, undetected & not inspected weekly |
| ⑥ 40 CFR 265.193(b)(1) | All HW Tanks ancillary equipment did not have secondary containment |
| ⑦ 40 CFR 265.193(b)(2) | Secondary Containment not in good condition |
| ⑧ 40 CFR 265.195 | Inadequate tank inspections and documentation |

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
Dedriel Newsome Gardner
300 Minnesota Ave.
Kansas City, KS 66101
ATTN: Dedriel Newsome Gardner

If you have any questions about this Notice or wish to discuss your response, you may call me at
913 551 7049, or Ed Buckner (Compliance Officer) at
913 551 7621.

This Notice prepared by Dedriel Newsome Gardner Date: 6/23/16

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Jonathan Eckles Date: 6/23/16
Signature: [Signature]
Title: Environmental Manager